

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HENRY WATKINS,

Plaintiff,

v.

PENNSYLVANIA BOARD OF  
PROBATION & PAROLE,  
EDWARD JONES, and MICHAEL BUKATA

Defendants.

NO. 02-CV-2881

**JURY VERDICT FORM FOR WILLIE E. JONES  
IN HIS INDIVIDUAL CAPACITY**

**A. Disparate Treatment**

1. Do you find that the plaintiff has proved by a preponderance of the evidence that Defendant Willie E. Jones, as an individual, subjected plaintiff to an adverse tangible employment action?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If you answered "YES" to Question 1, continue to Question 2. If you answered "NO" to Question 1, do not answer anymore questions and have the foreperson sign and date this verdict form.*

2. Do you find that plaintiff has proved by a preponderance of the evidence that race was the determinative factor in motivating Mr. Jones, as an individual, to take an adverse, tangible employment action against Mr. Watkins?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If you answered "YES" to Question 2, continue to question 3. If you answered "NO" to Question 2, do not answer anymore questions and have the foreperson sign and date this verdict form.*

**B. Damages**

*Please answer Question 3 only if you found in favor of plaintiff on his disparate treatment claim. In other words, you should only answer these questions if you answered "YES" to Questions 1 and 2.*

3. Do you find that the plaintiff has proved by a preponderance of the evidence that plaintiff should be awarded damages against Mr. Jones, as an individual, to compensate for emotional pain and mental anguish?

YES \_\_\_\_\_

NO \_\_\_\_\_

*If your answer is "YES," insert the amount of compensatory damages that will reasonably compensate plaintiff for his emotional pain and mental anguish in the space provided below.*

\$ \_\_\_\_\_


Foreperson: \_\_\_\_\_

Dated: \_\_\_\_\_

Respectfully submitted,

Dilworth Paxson LLP

By: \_\_\_\_\_

  
GINO J. BENEDETTI, ESQUIRE  
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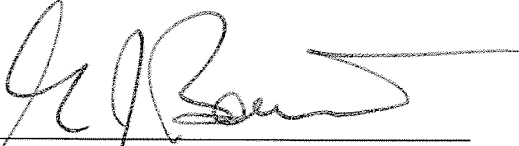
Attorney for Defendants,  
Pennsylvania Board of Probation and Parole,  
Willie E. Jones, and Michael Bukata

Dated: November 28, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Jury Verdict Form For Willie Jones in his Individual Capacity has been served upon the following counsel this 28<sup>th</sup> day of November, 2007, via First Class Mail and Electronic Court Filing:

Robert Sugarman, Esquire  
Robert Morris Building – 11<sup>th</sup> Floor  
100 N. 17<sup>th</sup> St.  
Philadelphia, PA 19103

  
\_\_\_\_\_  
Gino J. Benedetti, Esquire  
Attorney I.D. No.: 59584

**DILWORTH PAXSON LLP**

Dated: November 28, 2007